

## **REMARKS**

### **Amendments**

#### ***Amendments to the Claims***

Applicant has amended the claims to more particularly point out what Applicant regards as the invention. Specifically, the invention as claimed processes variable length encoding tasks by a co-processor concurrently with the processing of the other video encoding tasks by a main processor. Claims 11, 22 and 37 are canceled without prejudice. No new matter has been added as a result of these amendments.

### **Rejections**

#### ***Rejections under 35 U.S.C. § 102(e)***

##### **Claims 1-2, 7, 9, 21, 29 and 32**

Claims 1-2, 7, 9, 22, 29 and 32 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Linzer, U.S. Patent No. 6,229,850. Applicant does not admit that Linzer is prior art and reserves the right to swear behind the reference at a later date. Nonetheless, Applicant respectfully submits that Applicant's invention as claimed in claims 1-2, 7, 9, 21, 29 and 32 is not anticipated by Linzer.

Linzer discloses creating multiple resolution versions of a video signal by using a high quality video compressor to create high quality compressed video and a low quality video compressor that creates low quality compressed video. Both video compressors use the same video input signal when creating the multiple resolution video versions.

Applicant respectfully submits that Linzer does not teach or suggest each and every limitation of Applicant's invention as claimed. In independent claim 1, Applicant claims concurrently processing variable length encoding tasks with a co-processor and non-variable length encoding tasks with a main processor. In contrast, Linzer discloses creating two different versions of compressed video using two video compressors. Because Linzer discloses each compressor producing a distinct compressed video version, Linzer cannot be properly interpreted as disclosing processing variably length encoding tasks with a co-processor and non-variable length encoding tasks with a main

processor. Therefore, Linzer does not teach or suggest the claimed element of concurrently processing variable length encoding tasks with a co-processor and non-variable length encoding tasks with a main processor as claimed in claim 1 and claims 2, 7 and 9 that depend from claim 1.

Furthermore, Applicant notes that the Examiner does not assert Linzer anticipates Applicant's independent claims 12, 28 and 37. Similar to claim 1, claims 12, 28 and 37 claim concurrently processing variable length encoding tasks with a co-processor and non-variable length encoding tasks with a main processor. Thus, as per above, Linzer cannot be properly interpreted as anticipating claims 12, 28 and 37. Furthermore, because claims 21, 29 and 32 depend from claims 12, 28 and 37, respectively, Linzer cannot be properly interpreted as anticipating claims 21, 29 and 32.

Accordingly, Applicant respectfully submits that the invention claims in claims 1-2, 7, 9, 21-22, 29 and 31-32 is not anticipated by Linzer under 35 U.S.C. § 102(e) and respectfully requests the withdrawal of the rejection of the claims.

***Rejections under 35 U.S.C. § 102(b)***

**Claims 1-4, 7-15, 18-25, 28-34 and 37-39**

Claims 1-4, 7-15, 18-25, 28-34 and 37-39 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Woo, U.S. Patent No. 5,781,788. Applicant respectfully submits that Woo does not disclose each and every element of the invention as claimed in claims 1-4, 7-15, 18-25, 28-34 and 37-39.

Woo discloses simultaneously encoding and decoding video using a single video compression/decompression chip. The video chip comprises separate circuitry to run length encode and variably length encode inputted video. When encoding, the results of the run length encoding circuit are fed to the input of the variable length encoding circuit.

Applicant respectfully submits that Woo does not teach or suggest each and every limitation of Applicant's invention as claimed. In independent claims 1, 12, 28 and 37, Applicant claims concurrently processing variable length encoding tasks with a co-processor and non-variable length encoding tasks with a main processor. In contrast, Woo's video chip does not encode video using concurrent processing. For example, results of the run length encoding circuit feed the input of the variable length encoding circuit. Because Woo's video chip serially encodes video, Woo cannot be properly

interpreted as disclosing concurrently processing video encoding tasks with a main processor and a co-processor. Therefore, Woo does not teach or suggest the claimed element of concurrently processing variable length encoding tasks with a co-processor and non-variable length encoding tasks with a main processor as claimed in claims 1, 12, 28 and 37.

Accordingly, Applicant respectfully submits that the invention claims in claims 1-4, 7-15, 18-25, 28-34 and 37-39 is not anticipated by Woo under 35 U.S.C. § 102(b) and respectfully requests the withdrawal of the rejection of the claims.

### ***Rejections under 35 U.S.C. § 103***

#### **Claims 6, 17, 27 and 36**

Claims 6, 17, 27 and 36 stand rejected under 35 U.S.C. § 103(a) as being obvious over Woo in view of Linzer. Applicant respectfully submits that the combination of Woo and Linzer does not support a *prima facie* case of obviousness because the combination does not teach or suggest each and every limitation of Applicant's invention as claimed. Claims 6, 17, 27 and 36 depend from claims 1, 12, 28 and 37, respectively. However, neither Woo nor Linzer discloses each and every claim limitation of claims 1, 12, 28 and 37. Thus, the combination cannot be properly interpreted as disclosing claims 1, 12, 28 and 37 and claims 6, 17, 27 and 36 that depend from them. Therefore, the combination cannot render obvious Applicant's invention as claimed in claims 6, 17, 27 and 36, and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

#### **Claims 5, 16, 26 and 35**

Claims 5, 16, 26 and 35 stand rejected under 35 U.S.C. § 103(a) as being obvious over Woo in view of Lee, U.S. Patent No. 6,317,460. Lee qualifies as prior art only under 35 U.S.C. § 102(e) because it issued after Applicant's effective filing date. Applicant does not admit that Lee is prior art and reserves the right to swear behind the reference at a later date. Nonetheless, Applicant respectfully submits that the combination is does not teach each and every element of the invention as claimed in claims 5, 16, 26 and 35.

Lee discloses creating motion vectors used in video compression by interpolating from a different set of motion vectors. Interpolating a motion vector is less computationally intensive than generating the motion vectors for each video frame.

Applicant respectfully submits that the combination of Woo and Lee does not support a *prima facie* case of obviousness because the combination does not teach or suggest each and every limitation of Applicant's invention as claimed in claims 5, 16, 26 and 35. Claims 5, 16, 26 and 35 depend from independent claims 1, 12, 28 and 37, respectively. Because Woo does not teach or suggest each and every claim limitation of claims 1, 12, 28 and 37, Lee must disclose at the least the missing element from claims 1, 12, 28 and 37 in order to have a proper *prima facie* case for claims 5, 16, 26 and 35.

However, Lee does not teach or suggest concurrently processing video encoding tasks with a main processor and a co-processor as claimed. As neither Woo, nor Lee, teach or suggest this element as claimed in claims 1, 12, 28 and 37, the combination cannot be interpreted as disclosed claims 1, 12, 28 and 37 and claims 5, 16, 26 and 35 that depend on them. Therefore, the combination cannot render obvious Applicant's invention as claimed in claims 5, 16, 26 and 35, and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

### **SUMMARY**

Claims 1-10, 12-21, 23-36, 38 and 39 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Eric Replogle at (408) 720-8300.

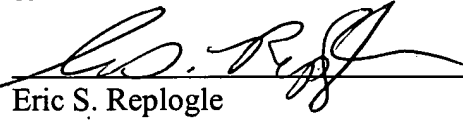
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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